



January 21, 2010

Mr. Paul Stacey
Bureau of Water Protection & Land Reuse
State Department of Environmental Protection
79 Elm Street
Hartford, CT 06106

Re: Proposed Stream Flow Regulations

The Connecticut Council of Small Towns (COST) urges rejection of the proposed stream flow regulations because they will have a significant, adverse impact on many of Connecticut's smaller towns and cities.

Although COST supports efforts to protect our rivers and streams, we are concerned that the regulations, as currently drafted, do not provide the appropriate balance needed to ensure sufficient water supplies to meet the needs of Connecticut's citizens.

In fact, many communities throughout Connecticut will simply not have the water required by their existing residents and businesses under the proposed regulations. In addition, some communities will face potential moratoriums on new water service connections which will bring economic development to a standstill.

COST is also concerned that compliance with the draft regulations will impose significant costs on our towns and cities. Rates increases, which would be inevitable under the proposed regulations, will have severe financial implications for municipalities across the board. But even more troubling, local economies and revenue bases in communities faced with moratoriums on new service connections will stagnate, leading to further economic decline and job loss.

Town and cities served by municipal water departments will be required to shoulder the cost – in many cases millions of dollars – for upgrades to their dams and other infrastructure in order to make the releases required under the proposed regulations. In addition, some towns may have no choice but to look at developing new sources of supply which will cost millions of dollars. Although the brunt of these costs will be reflected in water rates, some costs will be passed on to towns and cities and their taxpayers

Coming at a time when most towns and cities don't have sufficient revenues and/or state aid to fill the potholes in their roads, the proposed stream flow regulations make little sense. Unfunded mandates like this are breaking the "financial backs" of Connecticut's municipalities. State officials must refrain from imposing additional burdens on our towns and cities, which are facing brutal increases in costs at a time when revenues are shrinking.

We urge DEP to suspend further action on the proposed stream flow regulations and work with cities and towns to develop a balanced approach to stream flow issues.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bart Russell". The signature is fluid and cursive, with the first name "Bart" being more prominent than the last name "Russell".

Bart Russell
Executive Director
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